

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHIELD TECHNOLOGIES CORPORATION,)	
)	
Plaintiff,)	
)	
VS)	Case No. 11-CV-7050
)	
SHIELD ACQUISITION GROUP, LLC)	<i>Judge John W. Darrah</i>
)	<i>Magistrate Sheila Finnegan</i>
Defendant.)	

**EMERGENCY MOTION FOR LEAVE TO CONDUCT INVESTIGATION
AND CONTACT WITNESSES WITH REGARD TO PREPARATION FOR
HEARING ON MOTION TO HOLD SAMUEL SAX IN CRIMINAL CONTEMPT**

Now comes the alleged contempnor, Samuel Wm. Sax, by his attorney, George L. Grumley and Richard C. Carey in connection with preparation of a response to SAG's Motion for a Rule to Show Cause directed to him; and requests this Honorable Court for leave to conduct an investigation including interviewing and deposing witnesses. In support thereof the Movant states as follows:

1. On March 29, 2012, the Defendant SAG filed a Motion to hold Samuel Wm. Sax in contempt of Court upon the invitation of Judge John Darrah. There has been no briefing schedule set giving Samuel Sax an opportunity to respond on the issue of whether a Rule should issue or not. The Rule has merely been requested and has not issued. The Motion, if successful, exposes Samuel Sax to fines and incarceration. Counsel for Mr. Sax must be given both an adequate time to prepare a response to the Motion and, if necessary, time with in which to investigate the claims made in the Motion and to prepare for any hearing if a Rule should issue.

2. Mr. Sax is 78 years old..

3. The Motion filed by SAG complains that Samuel Sax had impermissible contacts with Ron Wawrzon and Robert Ward, which were purportedly witnessed by Kate Ward.

4. Samuel Sax in, order to prepare for this Motion and any resulting hearing, must have an opportunity to interview through counsel and depose if necessary to preserve the testimony of Robert

Ward, Ron Wawrzon, Kate Ward and Jonathon Quinn, and any other employee of Shield who may have had knowledge of these events.

5. Samuel Sax requests, through his counsel that, any interviews take place outside the presence of SAG's counsel and that any depositions take place upon notice to the deponent and SAG's counsel.

6. Counsel for Samuel Sax requires 30 days to complete his investigation into the facts surrounding the allegations made in the Motion plus an additional 15 days to file an appropriate response. Counsel respectfully requests this amount of time because he is preparing for a jury trial which is due to commence on April 30, in Houston, Texas.

WHEREFORE, Samuel Wm. Sax requests this Honorable Court to permit him thirty days within which to complete his investigation, including interviews and depositions into the matters alleged in the Motion for a Rule to Show Cause and ten days thereafter within which to file his response to the Motion and for such other relief as may be just and appropriate.

Respectfully submitted,
SAMUEL WM. SAX.

BY: /s George L. Grumley

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CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that I sent this document to all counsel of record via the Court's ECF/CM service.

/s/ George L. Grumley